

FILED

DEC 28 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

EZEKIEL DAVIS,
PLAINTIFF,
v.
CORECIVIC, INC.,
et al.,
DEFENDANTS.

By PATRICK KLANEY
Clerk U.S. District Court
Deputy Clerk

Case No. 18-396
JFH-SPS

DECLARATION IN SUPPORT OF PLAINTIFF'S
MOTION FOR A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

EZEKIEL DAVIS STATES:

- 1.) I AM THE PLAINTIFF IN THIS CASE. I MAKE THIS DECLARATION IN support of my motion for a temporary restraining order and preliminary injunction to ENSURE that I RECEIVE NECESSARY MEDICAL CARE, that my life is NOT put in danger by prison employees who has told other inmates that I AM A SNITCH including my present cell mate. SEE: Exhibit 5.
- 2.) I AM IN FEAR FOR MY LIFE OF CATCHING CORONAVIRUS FROM DEFENDANTS coming to work sick.
- 3.) ON Sept. 25, 2020, WHILE AT OSP I WAS TAKEN TO OUMC FOR A MRI, to - date I HAVE BEEN DENIED MRI-RADIOLOGIST REPORT, AND THEN ON Oct. 2, 2020 I WAS TRANSFERRED BACK TO DCF, AND DENIED MY MRI-RADIOLOGIST REPORT WHEN ITS IN MY MEDICAL RECORD AND I WANT TO SUBMIT IT TO THE COURT, BECAUSE I AM EXPERIENCE NEW PAIN THAT SHOOTS DOWN MY NECK AND WHEN I'M SITTING OR LAYING DOWN AND TRY TO STAND I'M HAVING PAIN AND WEAKNESS IN MY LOWER BACK, BUTTOCK AND LEG. SEE: Exh. 6; 9; 10; 11
- 4.) DEFENDANTS AT OSP SET ME UP ON FEB. 11, 2020 TO CONFISCATE ALL MY LEGAL PROPERTY AND OSP HAS MY LEGAL PROPERTY AT THE FACILITY AND HAS NOT TRANSFERRED IT TO DCF to - date.

PURSUANT TO 28 U.S.C. 1746, I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Ezekiel Davis 12-21-20
SIGNATURE DATE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

EZEKIEL DAVIS,
PLAINTIFF,

v.

CORE CIVIC, INC.,

et al.,

DEFENDANTS

CASE NO.

DECLARATION IN SUPPORT OF PLAINTIFF'S
MOTION FOR A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION

- 9.) THE DEFENDANTS CORE CIVIC AND DCF MEDICAL ONLY HAVE DR. SANDERS AND DEFENDANT S. BREYER TO PROVIDE MEDICAL CARE FOR OVER 1,700 INMATES AT DCF, AND DR. SANDER NEVER COME TO DCF-MAX UNIT TO PROVIDE MEDICAL CARE.
- 10.) THE DEFENDANTS ARE CONTINUING TO VIOLATE MY CONSTITUTIONAL RIGHTS BY PROVIDE INEFFECTIVE MEDICAL CARE, NOT TELLING ME THE CONDITION OF MY SPINE AND WHY I'M SUFFERING IN MORE PAIN, AND I'VE PUT IN SICK CALLS REQUEST, AND HAS NOT BEEN SEEN DUE TO DCF ONLY HAVING ONE MEDICAL DOCTOR AND ONE (1) NURSE PRACTITIONER.
- 11.) I AM IN IMMINENT DANGER OF SUFFERING SERIOUS PHYSICAL INJURY DUE TO THE CONTINUOUS VIOLATION OF MY CONSTITUTIONAL RIGHTS BY DELAYING ADEQUATE MEDICAL CARE BY A PHYSICIAN QUALIFIED TO ASSESS MY SERIOUS. NEUROLOGIST CAN PRESCRIBE A PROPER COURSE OF TREATMENT.
- 12.) FOR THE REASONS SET FORTH IN THE MEMORANDUM OF LAW FILED WITH THIS MOTION, THE PLAINTIFF IS ENTITLED TO A TEMPORARY RESTRAINING ORDER REQUIRING THE DEFENDANTS TO ALLOW ME TO HAVE ARCH SUPPORT FOR MY FEET SO WHEN I WALK I WON'T AGGRAVATE MY SPINAL CONDITION; PROVIDE ADEQUATE MEDICAL CARE FOR MY SPINAL CONDITION; STOP RETALIATING BY TELLING MY CELLMATES THAT I'M A RAT OR SWITCH TO PIT THEM AGAINST ME.
SEE: EXH. 5.

PURSUANT TO 28 U.S.C. 1746, I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Ezekiel Davis / 12-21-20
SIGNATURE DATE

Certificate of Mailing

I hereby certify that on 12-21-20 I mailed a true and correct copy of the foregoing "MEMORANDUM OF LAW In Support of Plaintiff's Motion For A Temporary Restraining Order And Preliminary Injunction", postage per paid to the Clerk of the Court, requesting the attached document to be forwarded to the attorneys on record in this case using the ECF System to electronically forward it to the below named

DARRELL L. MOORE
KARI HAWKINS, AAG

Ezekiel Davis

Medunison

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Oklahoma Department of Corrections

Oklahoma Department of Corrections Private and DOC: CCA Formulary Group Number:

DAVIS, EZEKIEL
 OK DoC Offender ID 186754
 07/07/1969 (49) M African American
 Davis Correctional Facility

MENTAL HEALTH PREA INTERVIEW - 12/07/16 11:29 AM

SUBJECTIVE DATA:*Reason for this visit:* Initial;*Referral source:* Security;*Chief Complaint:**Other:*

Inmate Ezekiel L. Davis was referred for a mental health evaluation following a PREA complaint identifying him as the alleged perpetrator. Prior to his interview, Inmate Davis was provided with an explanation of the limits of confidentiality for this evaluation. He said that he would agree to the evaluation if he could talk about his version of the events surrounding the PREA complaint.

Current signs or symptoms and/or responses to treatment:

A review of Inmate Davis' electronic health record reveals that he does not have a history of mental health treatment prior to his incarceration. He does not have an apparent history of suicidal thinking or attempts. Since his incarceration, Inmate Davis has been treated with neuroleptic and antidepressant medication. He does not, however, have a diagnosis of a mental health symptom disorder. He is diagnosed with Paranoid Personality Disorder. He has not received mental health treatment within the correctional system since 2014. A review of Inmate Davis' Department of Corrections' records indicate that he has a 1990 conviction for First Degree Murder and is serving a life sentence.

Developmentally, Inmate Davis recalls his childhood in Memphis, Tennessee and Tulsa, Oklahoma in positive terms. He said that he was loved and that discipline in his home was very strict. He denied experiencing physical, sexual, or emotional abuse as a child, but he also said that his grandmother would hit him with a belt when he misbehaved. Similarly, Inmate Davis said that school was "fun" and that he was a successful school student and athlete. He specifically recalled high school as "OK" because of school sports, but he later said that he with school in the 9th grade, later admitting that he was expelled for selling drugs on school property. At about age 14, Inmate Davis started selling controlled dangerous substances. He was "rebellious" and "out on the streets" he related. From that time until 1990, when he was first incarcerated at age 19, Inmate Davis did not commit property crimes, theft with confrontation, set fires, or harm animals, according to his self-reports. He denied violent behavior prior to his instant offense, but he later admitted to "slapping people around, pistol whipping. I only shot one guy and was convicted of first degree murder." When asked about his own drug use, Inmate Davis was very emphatic that he is not addicted. He reported drinking beer and "clear liquors" until intoxicated and smoking cannabis 3-4 times weekly starting at age 14. He continues to use cannabis while incarcerated and said, "I'll never stop. I don't think there is anything wrong with it." Inmate Davis reported a legal work history including "working in the food industry," specifically working in a restaurant, and collecting trash and then installing radios for the City of Tulsa. He quit his first job after 6 months, the second after 9 months, and was "laid off from my last job because I had a car accident." Inmate Davis has not had a long term intimate relationship. He said that since 1990, he has had sexual intercourse with numerous women working in the correctional system. He said that he reported one incident at this facility and that this was investigated by the Oklahoma Office of the Inspector General. Inmate Davis self-identifies as heterosexual and denied any sexual behavior with males either voluntary or involuntary. During his incarceration, Inmate Davis said that he has had disciplinary infractions for "stupid stuff," later elaborating that he stole a video game from the property room because, "I had no money and it cost \$50.00" As this discussion continued, he admitted that he had been disciplined for threatening a female staff member, which he described as justified, and for having a knife and syringe. He did not deny having the knife and syringe, but described the cell search which discovered these as harassment and retaliation for reporting having had sex with a staff member. He also gave a legalistic explanation of why the prison's evidence resulting from the search was flawed. He said that he has refused orders, and has had "several fights." He explained that "When I have to be violent, I will to the death."

When interviewed, Inmate Davis was awake, alert, and fully oriented. His speech was well articulated. He alternated between terse explanations conveying minimal information and lengthy monologues arguing for his view that he is mistreated. Inmate Davis' thought form was non-psychotic. His paranoid thought content was very evident. He suspects everyone's motives, questioned why I took so many notes while we spoke, and gave explanations of various instances when others have plotted or colluded to harm him or block his goals. Inmate Davis' thought content was also very focused on self, and he described different ways in which he is superior to others, and various ways that he has felt offended by what others say or do. When asked about perceptual disturbances, Inmate Davis described a brief period during adulthood when he was housed in a single cell in a maximum security facility and had hypnagogic perceptions of music. Inmate Davis sought advice from mental health staff and was told that he was OK. Inmate Davis' affect was euthymic,

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Exhibit 1
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Oklahoma Department of Corrections

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Davis Correctional Facility

congruent, and appropriate in range. His motor activity level was appropriate to this task. Inmate Davis denied depressive and anxiety disorder symptoms. He denied symptoms of PTSD.

Inmate Davis denied suicidal and assaultive ideation, stressing that he would assault someone if they "were hurting me."

Comments on Subjective Findings:

In terms of personality functioning, Inmate Davis described violent and illegal behavior as justified, a response to aggression from others, and he described his behavior without any evidence of remorse. Describing his offense, he blamed his victim and his victim's daughter, whom he was dating. Inmate Davis said that she had complained that her father was abusive, and that his killing was a heroic sacrifice by Inmate Davis for a girl who later betrayed him. Throughout his interview, Inmate Davis attempted to depict himself as virtuous. Inmate Davis seldom mentioned others during his interview, and when he did he described them in negative terms. When asked to describe someone important in his life, he described the person briefly and superficially as a kind person who could still intimidate others by staring them down. When asked about a time he felt guilty, Inmate Davis first laughed and then discussed stealing the game from the property room. He said that he asked himself why he stole the game, but then justified the theft to himself because he would be unable to afford the game otherwise. As noted earlier, Inmate Davis' view of others is very suspicious of motives, very sure that others work together to harm him, and that others cannot be trusted. Overall, Inmate Davis does meet criteria for both Paranoid Personality Disorder and Antisocial Personality Disorder.

Inmate Davis has risk factors for perpetration that result in greater risk than typical for a medium security setting. These are: Early history of violence towards others, willingness to break laws or institutional rules, lack of remorse for actions, hostility towards others and willingness to act violently, perception of others as an undifferentiated mass, minimization and rationalization as defenses against self-reproach, impulsivity, having had sex during incarceration, he alleges, specifically with staff members, and a life sentence. Inmate Davis' risk for sexual victimization by other inmates is minimal. He is at risk for voluntary sexual intercourse with female staff, which is a PREA offense and exploitive. Inmate Davis has a history of assaulting others and has a conviction for murder. These factors, and his risk factors for sexual perpetration indicate that his potential for violence is greater than typical for his setting.

OBJECTIVE DATA:**Medications:**

Medication	Start Date	End Date
Neurontin 100 mg capsule oral 1 capsule(s) Once daily for 7 Days	12/05/2016	12/11/2016
Desyrel 50 mg tablet oral 1 tablet(s) Before bed for 300 Days	11/29/2016	09/24/2017
Motrin 800 mg tablet oral 1 tablet(s) Twice daily for 300 Days	11/29/2016	09/24/2017
Prilosec 20 mg enteric coated capsule oral 1 capsule(s) Once daily for 300 Days	11/29/2016	09/24/2017
Topamax 50 mg tablet oral 1 tablet(s) Twice daily for 300 Days	11/29/2016	09/24/2017
Catapres 0.3 mg tablet oral 1 tablet(s) Twice daily for 358 Days	10/24/2016	10/16/2017
Notes: HTN		
Chlor-Trimeton 4 mg tablet oral 1 tablet(s) Twice daily for 358 Days	10/24/2016	10/16/2017
LISINOPRIL/HCTZ 20 mg-25 mg tablet oral 1 tablet(s) Once daily for 358 Days	10/24/2016	10/16/2017
Lopressor 100 mg tablet oral 1 tablet(s) Twice daily for 358 Days	10/24/2016	10/16/2017
Notes: CCV, increased dose for better control		
Pain Reliever Added Strength 250 mg-250 mg-65 mg tablet oral 2 tablet(s) Twice daily for 358 Days	10/24/2016	10/16/2017

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<https://ehr.docsynergy.com/DocSynergy/CentralMR/NotePrint.aspx?PatientUserCode=100...> 7/15/2018

CCS000264

Medunison

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Oklahoma Department of Corrections Private and DOC: CCA Formulary Group Number:

DAVIS, EZEKIEL
 OK DoC Offender ID 186754
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 Davis Correctional Facility

Zocor 20 mg tablet oral
 1 tablet(s) Before bed for 358 Days

10/24/2016 10/16/2017

Appearance: Neat; Poised;*Offender observed to have poor or declining health?* No;*Behavior:* Other; Defensive, suspicious of the purposes of the evaluation*Mood:* Euthymic ;*Affect:* Other; Congruent*Speech:* Normal;*Perception:* No Abnormalities;*Thought Process:* Organized;*Thought content:* Paranoia;*Suicidal thoughts or behavior:* No;*Homicidal thoughts or behavior:* Yes;

Comment: History of assaults and conviction for murder. No plans or intentions to harm others today, but is very willing to use violence when he perceives threat.

Self injury thoughts or behavior: No;*Oriented to person, place, time:* Yes;*Concentration intact:* Yes;*Memory intact:* Yes;*Abstract thinking intact:* Yes;*Insight and judgement intact:* No;**ASSESSMENT:****Problems:**

Problem	Code	Source	Status	Begin	Resolved	Notes
CONSTIPATION NOS	564.00	ICD-9	Confirmed	05/14/2015		
HYPERLIPIDEMIA NEC/NOS	272.4	ICD-9	Suspected	04/17/2014		
Neck pain		SNOMED	Suspected	07/31/2012		
Paranoid Personality Disorder	301.0	DSM IV	Suspected	02/29/2012		
Chronic low back pain		SNOMED	Suspected	02/01/2012		
PLANTAR WART	078.12	ICD-9	Suspected	05/23/2011		cauterized
HYPERTENSION NOS	401.9	ICD-9	Suspected	09/16/2010		

Mental Health Classification Level:**Vitals:**

Measurement	10/06/16 01:43 PM
MH	A

EDUCATION:

Medication Education: Instructed offender on risks and benefits of medication adherence / non-adherence? Not applicable.
 Offender on no medications.;

PLAN:*Return Visit:* Other;*Specify:* PRN

Signed Electronically by Stephen Lange, PhD on 12/07/16 11:35 AM

Cosigned Electronically by Raymond Larimer, RN on 08/24/17 09:25 AM (requested by Dr. Fred S. Sanders, D.O. on
 08/23/17 05:20 PM)

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Oklahoma Department of Corrections

Oklahoma Department of Corrections Private and DOC: CCA Formulary Group Number:

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OK DoC Offender ID 186754

07/07/1969 (49) M African American

Davis Correctional Facility

Cosigned Electronically by Linda Lantrip, DO on 09/02/17 12:00 AM (requested by Dr. Fred S. Sanders, D.O. on 08/24/17 06:38 AM)

Cosigned Electronically by Sandra Sanford, LCSW on 09/04/17 07:09 PM (requested by Linda Lantrip, DO on 09/01/17 11:59 PM)

Cosigned Electronically by Victoria Shepherd, MEd, LPC, LADC on 09/02/17 11:08 AM (requested by Linda Lantrip, DO on 09/02/17 01:32 AM)

Cosigned Electronically by Joan Garvin, LPC on 09/04/17 01:05 PM (requested by Linda Lantrip, DO on 09/02/17 01:32 AM)

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<https://ehr.docsynergy.com/DocSynergy/CentralMR/NotePrint.aspx?PatientUserCode=100...> 7/15/2018

CCS000266

Oklahoma Department of Corrections

Oklahoma Department of Corrections Private and DOC: CCA Formulary Group Number:

DAVIS, EZEKIEL

OK DoC Offender ID 186754

1969 (49) M African American

Davis Correctional Facility

Temperature (F)			98.2	96.0	
Pulse (BPM)	91	98	90	97	75
Respirations (BPM)		17	16		
Heart Rate (BPM)				96	
PulseOx (%)		98.0	99.0	98.0	98.0
SBP (sitting)	119	153	143	140	148
DBP (sitting)	82	93	89	90	86
MH Level:					

Measurement	05/04/16 08:36 AM	09/11/14 02:27 PM
Height		77
Weight (lbs)	252.0	242.0
Temperature (F)	98.3	98.0
Pulse (BPM)	61	80
Respirations (BPM)	16	16
Heart Rate (BPM)	61	80
PulseOx (%)	98.0	98.0
SBP (sitting)	121	134
DBP (sitting)	77	84
MH Level:		

Note:**Extensive chart review:**

I/M has c/o "needing" MRI of neck and low back to Dx. long term back pain complaints back to at least 2010 (MVC 1988 or 1986). Wants Neck (c-Spine) better evaluated as he states that the neck pain was d/t having been "put down" by security several years ago (2/14/12 at OSR & from MVC).

He is also wanting, among other things: Medical boots/athletic shoes d/t right foot problem of chronic plantar wart, flat feet, bunions mostly on right foot. He was seen by Podiatrist 3 or 4/2016 requested new shoes for I/M d/t shoes being worn out (not for foot problem).

medical chair for his cell and for recreation, double mattress, change in medication distribution, Ice water twice a day, back brace with Lumbar support, Neurology consult, MRI, ETC.

I/M has had some of these requested and denied at other facilities as Medical evaluation by Physicians and Plain film X-rays have all been relatively normal with the exception of noted mild arthritic changes of the Lumbar spine and Modest degenerative changes (Osteophytic spurring) of the Cervical spine (last x-ray report 1/10/2017).

Since arrival at DCF 5/30/17 I/M has been in Max. Security ECHO unit. He has been seen by the Medical Provider 6/6/17, & 7/4/17. He has been seen by Dental, Optometry and Mental Health.

Review of I/M's medical record including recent evaluations at this facility do not seem to support the need for an MRI or CT-Scan of the C-spine or Lumbar-spine. Most of his back pain issues seem to center around wanting something to help him sleep. He currently has a back brace that he wears (?need).

There may be some merit to his needing Medical shoes (not Boots) d/t Plantar Wart, Bunions and flat feet esp. the right foot.

* I/M has spent a lot of time doing work in the Law Library and on his and others Legal cases. Here he continues to request the same things he has requested since at least 2010 and has used various tactics including threats, intimidation, shamming, and seem to be continuing to do so.

Will follow I/M and if further evaluation is every really deem needed/necessary will place request at that time.

CO-PAYMENT ASSIGNMENT ONLY (Select procedure 99211-office visit and/or medication(s) for co-payment)

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7/15/2018

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07/07/1969 (49) M African American
Davis Correctional Facility

Encounter: Chart review/?medical wants
Date/Time of Service: 08/24/17 06:54 AM
Location of Service: Davis Correctional Facility
Provider: Fred Sanders, D.O., DO Authorizing Provider: Fred Sanders, D.O., DO

Signed Electronically by Fred S. Sanders, D.O., DO on 08/24/17 08:44 AM
Cosi gned Electronically by Raymond Larimer, RN on 08/24/17 10:11 AM (requested by Dr. Fred S. Sanders, D.O. on 08/24/17 08:44 AM)

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Medunison

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Oklahoma Department of Corrections

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 Davis Correctional Facility

MENTAL HEALTH PROGRESS NOTE - SOAP - 10/06/16 11:37 AM**SUBJECTIVE DATA:***Reason for this visit:* Initial;*Referral source:* Sick Call;*Current signs or symptoms and/or responses to treatment:*

Offender reported many frustrations with how his physical issues and how they are being handled by facility. He wanted to know who denied nonformulary requests and appts, as well as how to get medical transfer. He was referred to MD and HSA. He became angry and asked what mental health could help with and was told coping and stress management, as MH could not make his medical decisions. He said this was bullshit and a waste of time and got up and left.

OBJECTIVE DATA:**Medications:**

<i>Medication</i>	<i>Start Date</i>	<i>End Date</i>
Neurontin300 mg capsule oral 1 capsule(s) Twice daily for 180 Days Notes: Neuropathy	09/16/2016	03/14/2017
Neurontin800 mg tablet oral 1 tablet(s) Twice daily for 180 Days Notes: Neuropathy	09/16/2016	03/14/2017
Catapres0.3 mg tablet oral 1 tablet(s) Twice daily for 110 Days Notes: HTN	08/24/2016	12/11/2016
LISINOPRIL/HCTZ20 mg-25 mg tablet oral 1 tablet(s) Once daily for 190 Days	05/28/2016	12/03/2016
Lopressor100 mg tablet oral 1 tablet(s) Twice daily for 190 Days Notes: CCV, increased dose for better control	05/28/2016	12/03/2016
Milk of Magnesia8% suspension oral 30 cc Each morning for 190 Days	05/28/2016	12/03/2016
Neurontin800 mg tablet oral 1 tablet(s) Twice daily for 190 Days D/C: order changed 9/13/16	05/20/2016	11/25/2016
Pain Reliever Added Strength250 mg-250 mg-65 mg tablet oral 2 tablet(s) Twice daily for 180 Days	05/13/2016	11/08/2016
Zocor20 mg tablet oral 1 tablet(s) Before bed for 180 Days	05/10/2016	11/05/2016

Appearance: Tense;*Offender observed to have poor or declining health?* No;*Behavior:* Agitated; Restless;*Mood:* Other; Angry*Affect:* Other; Mood congruent*Speech:* Normal;*Perception:* No Abnormalities;*Thought Process:* Organized;*Thought content:* Within normal limits;*Suicidal thoughts or behavior:* No;*Homicidal thoughts or behavior:* No;*Self injury thoughts or behavior:* No;*Oriented to person, place, time:* Yes;

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Exhibit 3
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Concentration intact: Yes;

Memory intact: Yes;

Reliable history and information from Record: Yes;

Reliable history and information from Offender: Yes;

ASSESSMENT:**Problems:**

Problem	Code	Source	Status	Begin	Resolved	Notes
CONSTIPATION NOS	564.00	ICD-9	Confirmed	05/14/2015		
HYPERLIPIDEMIA NEC/NOS	272.4	ICD-9	Suspected	04/17/2014		
Neck pain		SNOMED	Suspected	07/31/2012		
Chronic low back pain		SNOMED	Suspected	02/01/2012		
HYPERTENSION NOS	401.9	ICD-9	Suspected	09/16/2010		

Vitals:

Measurement	10/06/16 01:43 PM
MH	A

EDUCATION:

Medication Education: Instructed offender on risks and benefits of medication adherence / non-adherence? Not applicable.
Offender on no medications.;

PLAN:

Plan:

F/U PRN

Signed Electronically by Kimberly Weaks, Ph.D on 10/06/16 01:44 PM
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Davis Correctional Facility

AM	AM			Facility	
08/23/16 09:15 AM	08/23/16 09:30 AM	Medical: Nurse Visit	Completed	Lawton Correctional Facility	
09/13/16 10:30 AM	09/13/16 10:45 AM	Medical: Provider Visit	Completed	Lawton Correctional Facility	Gonzaga, MD,Mars
10/06/16 09:00 AM	10/06/16 09:15 AM	MH: Individual session	Completed	Lawton Correctional Facility	Weeks, Ph.D,Kimberly
10/13/16 09:30 AM	10/13/16 09:45 AM	Dental: Procedure	Completed	Lawton Correctional Facility	
10/13/16 12:15 PM	10/13/16 12:30 PM	Dental: Procedure	Completed	Lawton Correctional Facility	
10/18/16 07:00 AM	10/18/16 07:15 AM	MH: SHU weekly review	Completed	Lawton Correctional Facility	Lange, PhD,Stephen
10/24/16 09:00 AM	10/24/16 09:15 AM	Medical: Chronic Clinic	Completed	Lawton Correctional Facility	Cooper, ARNP,Patsy
10/25/16 07:00 AM	10/25/16 07:15 AM	MH: SHU 30 day review	Completed	Lawton Correctional Facility	Lange, PhD,Stephen
10/26/16 07:00 AM	10/26/16 07:15 AM	MH: SHU weekly review	Deleted	Lawton Correctional Facility	Lange, PhD,Stephen
10/27/16 07:00 AM	10/27/16 07:15 AM	MH: SHU weekly review	Deleted	Lawton Correctional Facility	Lange, PhD,Stephen
10/28/16 07:00 AM	10/28/16 07:15 AM	MH: SHU weekly review	Deleted	Lawton Correctional Facility	Lange, PhD,Stephen
10/29/16 07:00 AM	10/29/16 07:15 AM	MH: SHU weekly review	Deleted	Lawton Correctional Facility	Lange, PhD,Stephen
11/01/16 07:00 AM	11/01/16 07:15 AM	MH: SHU weekly review	Completed	Lawton Correctional Facility	Lange, PhD,Stephen
11/01/16 07:00 AM	11/01/16 07:15 AM	MH: SHU weekly review	Deleted	Lawton Correctional Facility	Lange, PhD,Stephen
11/03/16 06:15 AM	11/03/16 06:30 AM	Medical: Lab draw	No Show	Lawton Correctional Facility	
11/07/16 08:45 AM	11/07/16 09:00 AM	Medical: Lab draw	Waived	Lawton Correctional Facility	
11/29/16 12:00 PM	11/29/16 12:15 PM	Medical: Provider Visit	Completed	Lawton Correctional Facility	Musallam, MD,Sam
04/17/17 04:30 AM	04/17/17 04:45 AM	Medical: Lab draw	Scheduled	Lawton Correctional Facility	
04/24/17 09:30 AM	04/24/17 09:45 AM	Medical: Chronic Clinic	Scheduled	Lawton Correctional Facility	

Progress Note:

Offender released from main medical via security escort to new housing Unit condition stable at time of release.

CO-PAYMENT ASSIGNMENT ONLY (Select procedure 99211-office visit and/or medication(s) for co-payment)

Encounter: Released from medical Unit
Date/Time of Service: 12/05/16 01:37 PM
Location of Service: Lawton Correctional Facility

The contents of this document are confidential and restricted to authorized personnel of the Oklahoma Department of Corrections.

Exhibit
4

"DECLARATION"

I, Stephen E Rodda #262602, state under penalty of perjury on my own free will, being of sound mind state,

- 1.) I Road on the bus from OSP to DCF on Oct. 2, 2020 with Ezekiel Davis.
- 2.) We are cell mates, and on Oct. 6, 2020 after Mr. Davis spoke to Case Manager Robert King in his office on Echo Bravo, I went next to speak with Robert King whom told me that Mr. Davis may have said bad things about him (Mr. King), I told Mr King that Mr. Davis said he is the best case manager on Echo Max Unit.
- 3.) Mr. King, opened up a Max-Security Inmate Handbook with a PREA card telling me Mr. Davis has been accused of raping his cellmates and has several PREA complaints filed against him. I told Mr King that Mr. Davis is a good cellmate and I don't want the PREA Card.
- 4.) On Nov. 3, 2020, when I was taken out of the cell for an attorney call, a Mr. Pfaff, case Manager Echo Charley Pod, escorted me to the office on Echo Bravo, once in the office he (Mr. Pfaff) apologized saying he's sorry about my having to live with Mr. Davis, when I asked him why and I told him Mr. Davis is a good cellmate and we are cool, Mr. Pfaff told me Mr. Davis rats on staff and is a snitch, and that he is suing lot of DCF staff. Mr. Pfaff told me not to say anything to Mr. Davis about what he told me because he can get into trouble.

Pursuant to 28 U.S.C. SEC. 1746. I declare under penalty of perjury that the foregoing is true and correct.

Stephen E Rodda #262602 11-9-20
DATE
{Exhibit 5}

RECEIVED

OCT 06 2020

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

TO: MEDICAL SUPERVISOR FACILITY/UNIT: ACF DATE: 10-5-20
(NAME AND TITLE OF STAFF MEMBER)

I have have not ✓ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: N/A facility: N/A grievance #: N/A
I affirm that I do do not ✓ have a grievance pending on this issue.
I affirm that I do ✓ do not have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: CIV-16-462 (W.D. OK); CIV-17-373 (E.D. OK)
This request does ✓ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

I ARRIVED AT THIS FACILITY 10-2-20, ON 9-25-20 I WAS TAKEN
TO OCIMC FOR MRI ON MY SPINE. I WOULD LIKE A COPY OF THE MRI-
RADIOLOGIST REPORT. I HAVE SUBMITTED A SICK CALL REQUEST MAKING
THE SAME REQUEST WITH THE DISBURSEMENT.
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISBURSEMENT SEND ME THE MRI-RADIOLOGIST REPORT. SEE:
SICK CALL REQUEST DATE 10-5-20

NAME: Ezekiel Davis DOC NUMBER: 186754 UNIT & CELL NUMBER: 4B-413
(PRINT)

SIGNATURE: Ezekiel Davis (COPY NAME) WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE

OCT 08 2020

DISPOSITION: You will get it soon - please be
patient.

By [Signature] 10-9-2020
STAFF MEMBER DATE

OCT 13 2020

Date response sent to inmate/offender: _____

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

Exhibit 6
1 of 3

RECEIVED

OCT 23 2020

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

BY: _____

TO: RAY LARIMER, HSA FACILITY/UNIT: DCF DATE: 10-21-20
(NAME AND TITLE OF STAFF MEMBER)

I have ☒ have not _____ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: 10-5-20 facility: DCF grievance #: UNKNOWN RTS
I affirm that I do ☐ do not ☒ have a grievance pending on this issue.
I affirm that I do ☒ do not _____ have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: CIV-16-462 (WDR), CIV-17-393 (EOK)
This request _____ does ☒ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

ON 9-25-20 WHILE AT OMP I WAS TAKEN TO OUMC; I ARRIVED HERE ON 10-7-20;
ON 10-5-20, I SENT RTS (HASN'T BEEN RESPONDED TO) AND A SICK CALL REQUEST
(HASN'T BEEN RETURNED) 10-5-20 LETTING MEDICAL STAFF KNOW THAT I WANTED
A COPY OF MRI DONE 9-25-20 OUMC, I PROVIDED A DISBURSEMENT FOR (OVER)
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISPOSITION. I WOULD LIKE A COPY OF MY MRI-RADIOLOGIST REPORT DONE
9-25-20 AND BE SEEN BY MEDICAL CONCERNING MY NEURAL SYMPTOMS AND FOR SOMEONE
TO EXPLAIN THE MRI AND WHETHER I GOING TO LOSE THE USE OF MY LEGS.

NAME: EEKIE DAVIS DOC NUMBER: 186754 UNIT & CELL NUMBER: FC 213
(PRINT)

SIGNATURE: Eekie Davis WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE

OCT 23 2020

DISPOSITION:

Your request is being processed.

STAFF MEMBER

DATE

NOV 06 2020

Date response sent to inmate/offender: _____

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

Exhibit 6
2 of 3

MRI-Radiologist Report. I also outlined my new symptoms - I have shooting pain in my lower back to my buttock and leg when I sit and go to stand up, and when I am sitting I have excruciating pain in my lower back, plus my neck pain is more pronounced. I told Dr. Fabian this at OSA before MRI was ordered/referred.

I have pending civil cases concerning this issue/matter and I need copy of MRI to meet a deadline.

This is my second RTS and I believe that not only am I being shown deliberate indifference for my serious medical need, but I am being impeded intentionally by you and Dr. Sanders whom has already displayed prejudice when he slandered and defamed me (August 24, 2017) and I haven't harmed anyone... I just want to be treated like a human being, not a subject.

Exhibit 6
3 of 3

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

Rec'd
10-8-20

EZEKIEL DAVIS,

Plaintiff,

vs.

GEO GROUP CORRECTIONS,
INC., AMBER MARTIN, V.P.,
et al.,

Defendants.

Case No.: CIV-16-462-PRW
Judge Patrick R. Wyrick

**RESPONSE TO "PLAINTIFF'S MOTION FOR PRODUCTION OF
DOCUMENTS AND TANGIBLE THINGS"**

COME NOW the Defendant, GEO Group Corrections, Inc., by and through counsel of record, and for responses to "Plaintiff's Motion for Production of Documents and Tangible Things" submits the following:

GENERAL OBJECTIONS

The following general objections and conditions qualify, and are incorporated by reference into each and every response of this Defendant to Plaintiff's discovery requests.

1. Plaintiff is incarcerated for life at the Oklahoma State Penitentiary and one or more of his discovery requests seeks information which may, if released to him could, in turn, be released to other person in the penal system, which could result in actions detrimental to the good order and discipline with the system and, as such, Defendant generally and specifically objects to the production of any such information and documents.

Exhibit 7
1 of 6

2. Defendant objects to Plaintiff's discovery requests to the extent they attempt to impose any obligation upon Defendant beyond the requirements of the Federal Rules of Civil Procedure.
3. Defendant objects to Plaintiff's discovery requests to the extent they seek any information protected from discovery by the attorney/client privilege, work-product doctrine and/or any other applicable legal privilege or doctrine.
4. Defendant does not waive their objections to competency, relevancy, materiality and admissibility of the information or documents provided by providing the answers in the responses below with regard to its use at any subsequent proceeding or trial of this or any other action. Defendant reserves all objections to the use of such information at any subsequent proceeding or trial of this or any other action.
5. Defendant reserves the right to rely upon any facts which may develop or come to its attention at a later time as discovery continues. Defendant will supplement these answers, if necessary, as discovery continues as required by the Federal Rules of Civil Procedure.
6. Defendant objects to the discovery of information containing or constituting the identify, mental impressions, facts known or opinions held by any expert consultant who has been retained or specially employed by Defendant but who is not expected to be called as a witness at trial, because such information is exempt from discovery under Rule 26 of the Federal Rules of Civil Procedure.
7. Defendant objects to each discovery request to the extent it seeks information containing or relating to the statements of potential witnesses and parties made

subsequent to the occurrences and transactions upon which the claims of the parties are based and in connection with the prosecution or investigation of this suit or in anticipation of the prosecution or investigation of the claims at issue in this case, because such information is exempt from discovery under Rule 26 of the Federal Rules of Civil Procedure.

8. Defendant objects to each discovery request to the extent it seeks information containing or relating to communications between agents, representatives or employees of Defendant made subsequent to the occurrences or transactions on which the claims of the parties are based and in anticipation of the prosecution or defense of such claims, because such information is exempt from discovery under Rule 26 of the Federal Rules of Civil Procedure
9. Defendant objects to each discovery request that seeks to obtain information containing or relating to trade secrets or other confidential proprietary information of Defendant.
10. Defendant objects to each discovery request that seeks information containing or relating to any matter subject to a protective or confidentiality agreement or order.
11. Defendant objects to each discovery request to the extent it purports to require information or production of documents that are not within Defendant's possession, custody or control.
12. Defendant objects to each discovery request to the extent it requests addresses and/or telephone numbers of the parties or their respective current employees, officers or directors.

13. Defendant objects to each discovery request to the extent it requests identification of trial witnesses and/or trial exhibits prior to the deadline for disclosure of such information set by the court in this case.
14. Defendant objects to each interrogatory and request to the extent that it seeks information relating to any compromise or offer to compromise a disputed claim.
15. The responses made herein and the production of documents in response hereto in no way waive: (a) any objections by Defendant as to the competency, relevancy, materiality, privilege or admissibility of such responses or documents or to the subject matter thereof; (b) Defendant's right to object to the use of such responses or documents, or to the subject matter thereof, in any proceeding, including the trial of this or any other action; or (c) Defendant's right to object to any other document or discovery request or to any request for further responses to the discovery requests.
16. Defendant reserves the right in any hearing or proceeding, including the trial of this or any other action, to use additional documents of the nature specified herein which are acquired from sources other than Defendant.
17. Defendant reserves the right to produce additional responsive documents that may come to its attention in the future, and to use such documents in any hearing or proceeding, including the trial of this or any other action.
18. By agreeing to produce documents in response to a discovery request, Defendant does not admit that documents responsive to the request exist or that such documents are in Defendant's possession, custody or control. Rather, by agreeing to produce

documents responsive to a request, Defendant only agrees to produce such documents if they exist and if they are in Defendant's possession, custody or control.

19. Defendant reserves the right to supplement and/or amend these responses after further investigation and discovery.

20. Defendant incorporates by reference as if fully set forth the foregoing general objections as to each of their answers and responses.

RESPONSES TO INTERROGATORIES

REQUEST NO. 1: Produce the name of Stephen Lange employer. Stephen Lange is not named as a party to this action but may have information pertaining to the claims and defenses in this matter.

RESPONSE TO REQUEST NO. 1: Objection. Vague and ambiguous. Stephen Lange was not, at any time relevant to the matters alleged in Plaintiff's Amended Complaint, an employee of LCF or GEO.

REQUEST NO. 2: Produce the medical record where, when and who assessed me with a paranoid personality disorder as suspected 2-29-12.

RESPONSE TO REQUEST NO. 2: Objection. Without waiving this objection, these documents would best be obtained from your medical records as maintained by CCS.

Respectfully submitted,



Thomas G. Ferguson, Jr., OBA#2878
WALKER, FERGUSON & FERGUSON

Exhibit 7
5 of 6

941 East Britton Road
Oklahoma City, OK 73114
Telephone: 405-843-8855 / Facsimile: 405-843-8934
Email: tferg@wffatty.com
***Attorneys for Defendants, GEO Group Corrections,
Inc., (Amber Martin, V.P.), Hector A. Rios, Lt. Durant,
Lt. Dawson and Sgt. Adams***

CERTIFICATE OF MAILING

I hereby certify that on this 30th day of September, 2020, a true and correct copy of the above and foregoing document was mailed to:

Ezekiel Davis
Inmate #186754, C-2-18
OKLAHOMA STATE PENITENTIARY
P.O. Box 97
McAlester, OK 74502
Plaintiff - Pro Se

I hereby certify that on this 30th day of September, 2020, a true and correct copy of the above and foregoing document was emailed to:

Austin J. Young, Esq.
Sean P. Snider, Esq.
JOHNSON HANAN AND VOSLER
***Attorney for Defendants Christina
Thomas, Sheryl Denton, Dan Ronay,
Sam Musallam and Shahid Ansari***

*Via Email: ayoung@johnsonhanan.com
Via Email: ssnider@johnsonhanan.com*

Jessica L. Dark, Esq.
Russell L. Hendrickson, Esq.
PIERCE COUCH HENDRICKSON
BAYSINGER & GREEN, LLP
Attorneys for Mars Gonzaga, M.D.

*Via Email: jdark@piercecouch.com
Via Email: hendrickson@piercecouch.com*



THOMAS G. FERGUSON, JR.

SCOTT CROW
DIRECTOR



J. KEVIN STITT
GOVERNOR

STATE OF OKLAHOMA
OKLAHOMA DEPARTMENT OF CORRECTIONS
MEDICAL SERVICES

October 14, 2020

Ezekiel Davis, DOC #186754
Oklahoma State Penitentiary
P.O. Box 97
McAlester, OK 74502-0097

Re: Improperly Submitted Grievance (MARA-20-71)

Dear Mr. Davis:

Your grievance, which was marked as emergent and sensitive and dated September 9, 2020, was received in the medical services office on September 15, 2020. In accordance with OP-090124, I am returning (a copy of) your original correspondence unanswered for the following reason(s):

1. Grievance issue was not verified as sensitive or emergent in nature as defined in OP-090124, §VIII; consequently, the standard grievance process must be used.

PLEASE NOTE: You were placed on grievance restriction on April 15, 2020. Due to your continued misuse of the grievance process, your restriction is being extended through October 14, 2021. It is your responsibility to submit your grievance correspondence properly in accordance with OP-090124. Please read this policy carefully before you submit any other correspondence. Contact your case manager if you have questions or need further assistance regarding the grievance process. Any further misuse and/or abuse of the grievance process will be grounds for extending this restriction.

The appropriate method for addressing your health concerns is via the facility's sick call process. Please document such concerns on a "Request for Health Services" form and submit it to the medical unit at your facility. If necessary, an appointment can then be scheduled for you to be examined by a qualified health care professional.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheri Atkinson", with a stylized, flowing script.

Cheri Atkinson
Medical Services Manager

CA/rm

CC Regina VanBlaricom
Mark Knutson
File

Exhibit 8
1 of 8

INMATE/OFFENDER GRIEVANCE

Dept. of Corrections
Medical Administration

SEP 15 2020

Received

Grievance no. _____

Grievance code: _____

Response due: _____

"EMERGENCY & SENSITIVE"
GRIEVANCE

DO NOT WRITE ABOVE THIS LINE

Date 9-9-20Facility or Unit DSPName EZEKIEL DAVIS
(Print)Facility Housing Unit ME5-AADOC Number 186754Date "Request to Staff" response received: N/A

Have you previously submitted a grievance on this same issue? No! If yes, what date N/A, facility N/A, grievance # N/A. You must submit this completed original within 15 days of the receipt of the response to the "Request to Staff". The "Request to Staff" must have been submitted within 7 days of the incident. Do not include/attach anything to this grievance except the "Request to Staff" including the response. You may quote from or make reference to statutes, operations, field, or administrative memoranda, department publications (time sheets, inventory forms, assessments, etc.). You will be permitted only one opportunity to correct any error(s) made in submitting your grievance.

1. The nature of your complaint. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per grievance. Use backside of this page only, if necessary.

ON 9-4-20, I WAS MADE AWARE OF A FALSE "CHART ENTRY" IN MY MEDICAL RECORD BY STEPHEN LANGE, PHD AT THE LAWTON CORRECTIONAL FACILITY IN DEC. 7, 2016. I CONTEND THAT I NEVER SPOKE TO A STEPHEN LANGE ON 12-7-2016 ABOUT A PREA THAT ALLEGEDLY I WAS THE PERPETRATOR. IN FACT I WAS (OVER)

2. Informal action taken (including dates) to resolve the complaint, as well as the names of those employees from whom you sought an answer to your grievance.

No RTS REQUIRED PER ODOC POLICY OP-090124 (VIII) (1) & (2)

3. The action you believe the reviewing authority may lawfully take.

I WOULD LIKE THE FALSE, SLANDEROUS, DEFAMATORY AND PREJUDICIAL DIAGNOSIS EXPUNGED FROM MY MEDICAL RECORD.

Grievance report sent to (warden/facility head/deputy director/correctional health services administrator):

Boddy Honaker
Name
Ezekiel Davis
Signature of Grievant

COPY
MAKE

Chief Medical Officer (ODOC)
Title
9-9-20
Date Sent to Reviewing Authority

1. Original to file
2. Copy to inmate/offender

DOC 090124A (R 4/19)

Exhibit 8
2 of 8

EXONERATED BY CAMERA FOOTAGE BEING ABLE TO LOOK DIRECTLY IN TO THE CELL, THE INMATE THAT ACCUSED ME RECANTEED AND SAID HE JUST WANT TO BE MOVED TO ANOTHER UNIT/POD, I WAS LET OUT OF MEDICAL WHERE I SPENT THE NIGHT ON (12-4-16) LET OUT 12-5-16. SEE: MEDICAL RECORD 12-5-16.

NOW, I FILED PREA AGAINST KIMBERLY WEAKS OCT. 6, 2016 AND WAS INTERVIEWED BY A FEMALE I.G. AGENT OCT. 13, 2016, WHOM OBVIOUSLY ALLOWED STEPHEN LANGE TO HEAR THE INTERVIEW SHE RECORDED, WHICH CONTAIN SOME BACKGROUND.

HOWEVER, I WAS MISCONSTRUED AND STEPHEN LANGE ALLEGED I SAID THINGS THAT I NEVER SAID.

THE INTERVIEW WAS ALLEGEDLY SUPPOSE TO BE ABOUT PREA MY CELL MATE FILED HOWEVER, IT CAN CLEARLY BE SEEN TO BE ABOUT SEX WITH FEMALE STAFF, AND DESIGN TO CONDUCT A MENTAL HEALTH ASSESSMENT, ALSO THE ENTRY STATE I AGREED TO THE "EVALUATION" IF I COULD TALK ABOUT MY VERSION OF THE EVENTS SURROUNDING PREA, YET THIS IS NOT ABOUT A PREA - FROM MY CELL MATE, RATHER THE PREA WITH STAFF I FILED.

THE MENTAL HEALTH ASSESSMENT WAS DONE IN RETALIATION, I NEVER TALKED TO STEPHEN LANGE ON 12-7-16 OR ANY OTHER DAY, THIS WAS DONE TO PUNISH ME FOR MY PREA AGAINST KIMBERLY WEAKS, STEPHEN LANGE'S COLLEAGUE AND HE USED SOME OF THE INFORMATION I PROVIDED TO THE I. G. AGENT ON 10-13-16.

THIS HAS AFFECTED ME BECAUSE OTHER MEDICAL PERSONNEL AT DAVIS CORRECTIONAL FACILITY (OCF) WAS MADE PREJUDICE TOWARD ME, DR. SANDERS SLANDERED ME IN A "CHART ENTRY" IMMEDIATELY AFTER LEARNING ABOUT THE ENTRY MADE BY STEPHEN LANGE. SEE: MEDICAL RECORD "CHART ENTRY" DR. SANDERS 8-24-2017

Dept. of Corrections
Medical Administration

SEP 15 2020

Received

Exhibit 8
3 of 8

STATE of Oklahoma
Pittsburg County ss: Affiant Ezekiel Davis

I, Ezekiel Davis, being of lawful age depose and state, that the foregoing is true and correct to the best of my knowledge, the following is a list of all grievances I've filed within the last (12) months. Pursuant to OP-090124 (X)(3)(2)(a).

- 1) OSPG-20-67, Filed Feb. 24, 2020, EMERGENCY & SENSITIVE, CONCERNING MY PLACEMENT ON SHU Feb. 11, 2020 WHEN MY CELLMATE ATTEMPTED TO ATTACK ME. MARCH 10, 2020 DETERMINED NOT TO BE AN EMERGENCY & SENSITIVE GRIEVANCE. TOLD TO FOLLOW STANDARD GRIEVANCE PROCESS. NO APPEAL.
- 2) OSPG-20-70, Filed 2-25-20, REQUESTING BLACK MOLD TEST RESULTS NEVER GIVEN. UNANSWERED 3-12-20 DUE TO SENDING IT TO THE WARDEN, NOT REGINA VAN BLARICOM. GIVEN (10) DAYS TO RESUBMIT. NO RESUBMISSION.
- 3) OSPG-20-77, Filed 2-27-20, BROKEN LIGHT FIXTURE IN NW-2-L, GIVEN MISCONDUCT, UNANSWERED 3-12-20 BECAUSE GRIEVANCE CANNOT BE FILED ABOUT MISCONDUCTS, AND ADDITIONAL ISSUES SUBMITTED IN GRIEVANCE NOT IN RTS, GIVEN (6) DAYS TO RESUBMIT, NO RESUBMISSION. NO APPEAL.
- 4) OSPG-20-82, Filed 3-2-20, D.W. RANKINS REFUSAL TO VIEW CAMERA FOOTAGE FROM 2-11-20 INCIDENT AT C-2-18, RETURNED UNANSWERED, MORE THAN ONE ISSUE, ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS. GIVEN (10) DAYS RESUBMIT ON 3-23-20, RESUBMITTED 3-27-20. UNANSWERED ON 4-9-20 DUE TO ASKING ABOUT INFORMATION OF ANOTHER INMATE. NO APPEAL.
- 5) OSPG-20-86, Filed 3-3-20, ABOUT BEING GIVEN THE RUN AROUND ABOUT BLACK MOLD AND LEAD TEST UNANSWERED 3-23-20. SHOULD HAVE SENT TO REGINA VAN BLARICOM - NOT SENT TO CORRECT ADMINISTRATOR.
- 6) ARA-20-96, Filed 3-3-20, EMERGENCY & SENSITIVE, HIGH RANKING OSP PRISON OFFICIALS MAINTAINING A CODE OF SILENCE ABOUT WHY I WAS PLACED ON SHU ON 2-11-20 AND NOT MY CELL MATE WHO ATTEMPTED TO ATTACK ME AND THE DRUG KING HE WAS INVOLVED IN. UNANSWERED ARA DO NOT CONDUCT INVESTIGATIONS ON STAFF MISCONDUCT. 3-23-20.
- 7) OVAR-20-99, Filed 3-16-20, A.W. RANKINS MAINTAINING A CODE OF SILENCE ABOUT STAFF MISCONDUCT. UNANSWERED MORE THAN ONE ISSUE, ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS; ISSUE BEING ADDRESSED IN OSPG-20-82, 3-24-20
- 8) OVAR-20-100, Filed 3-16-20, REQUESTING FILED STAMP COPIES OF RTS, UNANSWERED 4-6-20 ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS, (10) DAYS RESUBMIT. NO RESUBMISSION.
- 9) OSPG-20-101, Filed 3-16-20, LEGAL DEADLINE NEEDED LEGAL DOCUMENTS, 4-6-20 PARTIAL RELIEF GRANTED.
- 10) ASPG-20-106, Filed 3-18-20, HALLROOM OPENING (LEGAL MAIL AND PRIVILEGED MAIL) OUTSIDE OF MY PRESENCE. 4-7-20 PARTIAL RELIEF GRANTED. STAFF DIRECTED TO FOLLOW POLICE.
- 11) OVAR-20-107, Filed 3-18-20, CHRISTI QUICK, CHIEF OF SECURITY LYING ABOUT WHY I WAS PLACED ON SHU ON 2-11-20. UNANSWERED 3-24-20 OUT OF TIME. GIVEN (10) DAYS TO RESUBMIT. APPEARED 3-20-20, DETERMINED OUT OF TIME BY ARA 4-24-20.
- 12) AARA-20-15, Filed 3-17-20, SENSITIVE, MEDICAL DENYING ADEQUATE SERVICE AND REGINA VAN BLARICOM MAINTAINING A CODE OF SILENCE, 4-15-20 UNANSWERED NOT SENSITIVE. PLACED ON GRIEVANCES RESTRICTION 4-15-20 TO 4-15-21.

Subscribed and sworn to
on 8th day of Sept 2020

Notary Public: [Signature]

My Commission Number: 18002542

My Commission Expires: 3-12-22

Ezekiel Davis
Affiant's Signature



Dept. of Corrections
Medical Administration

SEP 15 7/10

Received

Exhibit 8
4 of 8

1 of 4

State of Oklahoma)

Pittsburg County J SS: Affiant Ezekiel Davis

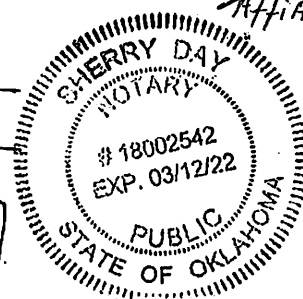
I, EZEKIEL DAVIS, BEING OF LAWFUL AGE DEPOSE AND STATE, THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, THE FOLLOWING IS A LIST OF ALL GRIEVANCES I'VE FILED WITHIN THE LAST (12) MONTHS. PURSUANT TO OF 090124 (C) (B) (2) (A)

- 13.) OSPG-20-122, FILED 3-25-20, MS. GREEN WOULD NOT ALLOW ME CELL WITH CLEON JOHNSON #256759 SHE HE WAS ON ADMIN. SEG., BUT WHEN CLEON JOHNSON #256759 ASKED HER MS. GREEN WAS WILLING TO DO THE MOVE. UNANSWERED 4-10-20, ALLEGEDLY MORE THAN ONE ISSUE, ADDITIONAL ISSUES IN THE GRIEVANCE NOT IN THE RTS, (10) DAYS TO RESUBMIT. NO RESUBMISSION.
- 14.) OSPG-20-127 FILED 3-31-20, NOT BEING ABLE TO GET LEGAL PROPERTY WHILE HANDCUFFED, BEING CHAINED, AND SHACKLED. 4-10-20 UNANSWERED MORE THAN ONE ISSUE, ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS, (10) DAYS RESUBMIT. NO RESUBMISSION.
- 15.) OSPG-20-130, FILED 3-31-20, BEING HARASSED BY OSP STAFF. 4-10-20 UNANSWERED GRIEVANCE NOT SENT TO CORRECT ADMINISTRATION. (10) DAYS RESUBMIT. NO RESUBMISSION.
- 16.) OSPG-20-134, FILED 4-2-20, BEING ON VAC (50) DAYS NOT ABLE TO CHECK OUT LEISURE LIBRARY BOOKS. 4-17-20 UNANSWERED ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS. (10) DAYS RESUBMIT. NO RESUBMISSION.
- 17.) OSPG-20-135, FILED 4-2-20, TOMMY SHARP MAINTAINING A CODE OF SILENCE, I AM BEING PUNISHED OUTSIDE OF POLICY I HAVE NO DL DAYS. 4-17-20 UNANSWERED, ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS. OUT OF TIME. NO APPEAL.
- 18.) OSPG-20-139, FILED 4-6-20, NANCY BATES STATED MS. DAY DON'T READ MY LEGAL MAIL, BUT SHE CAN'T KNOW THAT. 4-17-20 UNANSWERED, HAD BEEN PLACED ON GRIEVANCE RESTRICTION. NO RESUBMISSION. NO AFFIDAVIT.
- 19.) ARA-20-118, FILED 4-6-20, APPEALED BEING PLACED ON GRIEVANCE RESTRICTION. DENIED 4-24-20.
- 20.) Q123-20-169, FILED 4-28-20, GAVE MS. PINKLEY, MAILROOM, MY LEGAL DOCUMENTS TO PLACE IN MR. DAY MAILBOX AFTER MS. DAY TOLD ME I COULD DO SO. MS. DAY CLAIM SHE DIDN'T GET THEM. UNANSWERED 5-11-20 ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS. (10) DAYS RESUBMIT. RESUBMIT 5-15-20 RELIEF DENIED 6-1-20, MS. DAY WILL CONTINUE TO DO HER JOB. APPEALED 6-2-20. DENIED 6-16-20. AFFIDAVIT NOT COMPLETE.
- 21.) ARA-20-161, FILED 4-28-20, SENSITIVE BEING SERVED UNCOOKED FOOD. UNANSWERED 5-18-20 NOT SENSITIVE COMPLAINT CAN BE ADDRESSED AT FACILITY.
- 22.) OSPG-20-170, FILED 4-29-20, MS. DAY LOST MY LEGAL DOCUMENTS AFTER TELLING ME I COULD PLACE THEM IN HER MAILBOX. 5-11-20 UNANSWERED, ADDITIONAL ISSUES IN GRIEVANCE NOT IN RTS. (10) DAYS RESUBMIT. NO RESUBMISSION.
- 23.) OSPG-20-195 FILED 5-27-20, MS. DAY CREATING A FOLDER TO KEEP MY LEGAL DOCUMENTS AFTER VERIFYING DEADLINES - WITH THE ACTUAL MOTION FROM ATTORNEYS. RELIEF DENIED 6-16-20 NOTHING IN POLICY EXCLUDES LAW LIBRARY FROM KEEPING COPIES OF DEADLINE DOCUMENTS. 6-22-20 APPEAL - AFFIDAVIT FOR RESTRICTION WAS INCORRECT. MS. DAY NOT AT WORK 7-1-3-20. SUBSCRIBED AND SWORN TO

day of Sept 2020

Notary Public: [Signature]My Commission Number: 18002542My Commission Expires: 3-12-22

2 of 4



[Signature]
Affiant's Signature

Dept. of Corrections
Medical Administration

SEP 15 2020

Received

Exhibit 8
5 of 8

STATE OF OKLAHOMA)

Pittsburg County

} ss: Affidavit Ezekiel Davis

I, Ezekiel Davis, being of lawful age depose and state, that the foregoing is true and correct to the best of my knowledge, the following is a list of all grievance I've filed within the last (12) months. Pursuant to OP-090124 (2)(B)(2)(a)

CONF. NO. 23

23.) OSPR-20-195 - UNANSWERED ARA 7-9-20, affidavit incorrect, (10) days resubmit, resubmitted 7-15-20. 8-12-20 Affidavit incorrect, failed to follow instructions, out of time

24.) OSPR-20-198, filed 5-28-20, BEING punitively punished by being held on SHU, for (85) days with NO SANCTIONED SEGREGATION TIME TO SERVE. Partial relief granted after being on SHU (21) days on 6-16-20. Not being punitively punished awaiting transfer/bed placement. Appeal 6-22-20, UNANSWERED 7-9-20 Affidavit incorrect (10) days resubmit, resubmitted 7-15-20. 8-12-20 Affidavit incorrect, failed to follow instructions, out of time.

25.) OSP-20-200 filed 5-28-20, Needing access to my legal documents. Partial Relief 6-16-20 LEGAL MATERIAL AVAILABLE THROUGH UNIT TEAM, EXCHANGED 6-16-20.

26.) OSP-20-213 filed 6-20-20, Tommy Sharp maintaining code of silence by allowing Cpl. Hydon to retaliate after he threatened to rape me in the shower with another inmate. UNANSWERED 6-24-20, affidavit incorrect, MORE THAN ONE (1) issue, (10) days to resubmit, resubmitted 7-9-20. UNANSWERED 7-29-20, affidavit incorrect, MORE THAN ONE issue, fail to follow instructions.

27.) OSPR-20-216, filed 6-22-20, OSP staff - Unit TEAM giving me the run around when needed to exchange legal documents, 6-24-20 Affidavit incorrect, MORE THAN ONE (1) issue, additional issues submitted in grievance not in RTS. (10) days resubmit, resubmitted 7-9-20. UNANSWERED 7-29-20 Affidavit incorrectly, MORE THAN ONE issue, additional issue in grievance not in RTS, fail to follow instructions.

28.) OSP-20-224, filed 6-18-20, Ms. Pope, retaliated against me for saying I would file a grievance on her for denying me typing paper. I WAS GIVEN A CLASS X-25 MISCONDUCT. UNANSWERED 7-8-20 Affidavit incorrect, additional issues in grievance not in RTS, (10) days resubmit, resubmitted 7-14-20. UNANSWERED 7-29-20 Affidavit incorrect additional issues in grievance not in RTS, failed to follow instructions.

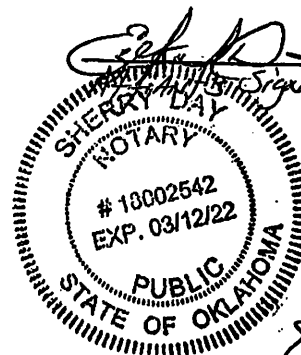
~~29.) OSP-20-213 filed 6-20-20, Cpl. Hydon threat to rape me while in the shower. Unit team was not to check out book. Unanswered 7-9-20, affidavit incorrect, MORE THAN ONE issue, additional issues in grievance not in RTS, (10) days resubmit, resubmitted 7-15-20.~~

~~30.) OSP-20-213 filed 6-20-20, Cpl. Hydon threat to rape me while in the shower. Unit team was not to check out book. Unanswered 7-9-20, affidavit incorrect, MORE THAN ONE issue, additional issues in grievance not in RTS, (10) days resubmit, resubmitted 7-15-20.~~

Subscribed and sworn to 8th day
of Sept 2020

Notary Public: 800My Commission Number: 78002542My Commission Expires: 3-12-22

3 of 4

Dept. of Corrections
Medical Administration

SEP 15 2020

Received

Exhibit 8
6 of 8

State of Oklahoma)
 Pittsburg County) ss: Affiant Ezekiel Davis

I, Ezekiel Davis, being of lawful age depose and state, that the foregoing is true and correct to the best of my knowledge, the following is a list of all grievances I've filed within the last (12) months, pursuant to OP-090124 (I) (B) (2) (C)

29) OSPG-20-235, filed 6-30-20, need to exchange legal property, UNANSWERED 7-14-20 not RTS, Affidavit, (10) days RESUBMIT, RESUBMITTED 7-23-20, UNANSWERED 8-10-20 Affidavit INCORRECT, no additional pages, out of time

30) OSPG-20-248, filed 7-7-20, Law Library creating a folder to keep my legal documents, not knowing how to verify a "rule imposed deadline", UNANSWERED 7-31-20, Affidavit INCORRECT, additional issues in grievance not in RTS, (10) days RESUBMIT, RESUBMITTED 8-3-20,

31) OSPG-20-249, file 7-7-20, Ms. Bowling will not let me file SEPARATES, UNANSWERED 7-31-20 Affidavit INCORRECT, additional issues in grievance not in RTS, (10) days RESUBMIT, RESUBMITTED 8-4-20, UNANSWERED 8-10-20, Affidavit INCORRECT, failed to follow instructions, 8-26-20 UNANSWERED, Affidavit INCORRECT, out of time.

32) OSPG-20-251, file 7-20-20, Ms. Quick maintain a code of silence about Law Library staff harassment, UNANSWERED 8-10-20, Affidavit INCORRECT (10) days RESUBMIT, RESUBMITTED 8-14-20

33) OSPG-20-277, file 8-5-20, Someone is tampering with my outgoing and incoming mail, 8-19-20, UNANSWERED Affidavit INCORRECT, (10) days to RESUBMIT, 9-8-20 Affidavit INCORRECT, out of time.

34) OSPG-20-280, file 8-5-20, RTS being with (7) days, 8-19-20, UNANSWERED Affidavit not correct, (10) days to RESUBMIT. 9-8-20 Affidavit INCORRECT out of time

Subscribed and sworn to
8th day of Sept 2020

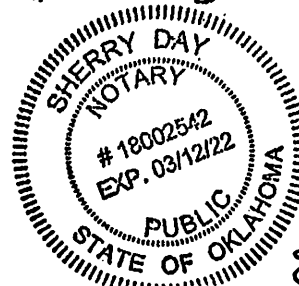
Notary Public: [Signature]

My Commission No.: 18002842

My Commission Expires: 3-12-22

4 of 4

Ezekiel Davis
 Affiant's Signature



Dept. of Corrections
 Medical Administration

SEP 15 2020

Received

Exhibit 8
 1 of 8

MR. EZEKIEL DAVIS
#186754, NE5-AA
P.O. Box 97
MCALESTER, OKLA 74502

TULSA OK 740

11 SEP 2020 PM 2



U.S. POSTAGE >> FITNEY BOWES



ZIP 74501 \$ 000.50⁰
02 4W
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PRIVILEGED
LEGAL
MAIL

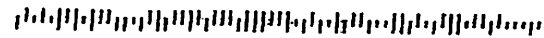
Dept. of Corrections
Medical Administration

SEP 15 2020

Received

c/o Medical Administrator
Review Authority
2901 N. CHASE BLVD, Suite 200
OKLA. CITY, OKLA. 73106

73106-543999



R

Exhibit 8
8 of 8

**OKLAHOMA DEPARTMENT OF CORRECTIONS
REQUEST FOR HEALTH SERVICES**

TO BE COMPLETED BY INMATEFacility: DCF/CORRECTIONAL Date: 10-5-20Inmate Name EZEKIEL DAVIS DOC # 186734 Unit EB-213

I request the following service(s): (Check appropriate box(s))

☒ Medical ☐ Mental Health ☐ Dental ☐ Optometry (eye) ☐ Medication Renewal
(expired medications only)

Reason for service: I WAS TAKEN TO OUMC FOR MRI (9-25-20) AND I WOULD LIKE TO KNOW THE RESULTS AND I NEED A COPY OF MRI-RADIOLOGY, AND I WOULD LIKE TO KNOW WHETHER I CAN BE SEEN BY A NEUROLOGIST TO LET ME KNOW WHAT SPINAL CONDITION IS AND WHAT CAN BE DONE.

I understand that in accordance with operations memorandum OP-140117 entitled, "Access to Health Care", I will be charged \$ 4 for each medical service I request and a charge of \$ 4 for each medication(s) dispensed to me, with the exceptions noted in the above-reference operations memorandum. There is no charge to the offender for mental health services and/or mental health medications.

Inmate Signature Ezekiel Davis Date: 10-5-20**TO BE COMPLETED BY HEALTH SERVICES**

Date Received

10/5/20

Initials

ES

Comment:

Refer to medical records
Refer to provider.

RN/LPN/Health Care Provider Signature

Date

10/5/20

"Return the "Request for Health Services" with the disposition of the inmate's request in the comment section to the inmate after scanning into the inmate's EHR.

NOTE: All "Keep on Person" (KOP's) medication refill requests must be submitted to the facility's health services unit or to the medical host facility, using the "Medication Refill Slip" (DOC 140130M). "Medication Refill Slips" must be submitted within ten days of the date the medication expires or runs out. "Medication Refill Slips" are readily available and accessible at designated locations within the facility.

Exhibit 93DOC 140117A
(R 5/17)

OKLAHOMA DEPARTMENT OF CORRECTIONS
REQUEST FOR HEALTH SERVICES

TO BE COMPLETED BY INMATE

Facility: ACFDate: 10-8-20Inmate Name Ezekiel Davis DOC # 186754 Unit EB-213

I request the following service(s): (Check appropriate box(s))

☒ Medical ☐ Mental Health ☐ Dental ☐ Optometry (eye) ☐ Medication Renewal
(expired medications only)

Reason for service: I would like to know whether medical can approve for me to be allowed to purchase athletic shoes by paying with my gang pay each month due to my spinal condition - because I do have high arches, bunions (right foot). This would help relieve pain in back when I need to walk

I understand that in accordance with operations memorandum OP-140117 entitled, "Access to Health Care", I will be charged \$ 4 for each medical service I request and a charge of \$ 4 for each medication(s) dispensed to me, with the exceptions noted in the above-reference operations memorandum. There is no charge to the offender for mental health services and/or mental health medications.

Inmate Signature Ezekiel DavisDate: 10-8-20

TO BE COMPLETED BY HEALTH SERVICES

Date Received

10-8-2020

Initials

Comment: You come in with gilligans from your previous facility no report of shoes from previous facility

Ray Laine R
RN/LPN/Health Care Provider Signature

10-8-2020
Date

"Return the "Request for Health Services" with the disposition of the inmate's request in the comment section to the inmate after scanning into the inmate's EHR.

NOTE: All "Keep on Person" (KOP's) medication refill requests must be submitted to the facility's health services unit or to the medical host facility, using the "Medication Refill Slip" (DOC 140130M). "Medication Refill Slips" must be submitted within ten days of the date the medication expires or runs out. "Medication Refill Slips" are readily available and accessible at designated locations within the facility.

Exhibit 103

DOC 140117A
(R 5/17)

OKLAHOMA DEPARTMENT OF CORRECTIONS
REQUEST FOR HEALTH SERVICES

TO BE COMPLETED BY INMATE

Facility: DCF Date: 10-15-20Inmate Name Ezekiel Davis DOC # 186754 Unit EB-213

I request the following service(s): (Check appropriate box(s))

☒ Medical ☐ Mental Health ☐ Dental ☐ Optometry (eye) ☐ Medication Renewal
(expired medications only)

Reason for service: I would like to see the doctor concerning my spinal condition that he is aware of, I would like to know when I can receive the neurologist consultation which I was told by Dr. Fabian at OSP would be next after MRI done at clinic 9-25-20. My spinal is painful (as is known) and my feet hurt when I walk - I have "high arches" not flat feet, and my right foot has a big bunion on it that hurts and a plantars wart. While at OSP Dr. Marlar was very adversarial toward me and made me uncomfortable with having him remove the plantars wart. In the sick call request on (10-8-20) I asked whether I could be approved through medical (over)

I understand that in accordance with operations memorandum OP-140117 entitled, "Access to Health Care", I will be charged \$ 4 for each medical service I request and a charge of \$ 4 for each medication(s) dispensed to me, with the exceptions noted in the above-reference operations memorandum. There is no charge to the offender for mental health services and/or mental health medications.

Inmate Signature Ezekiel Davis Date: 10-15-20

TO BE COMPLETED BY HEALTH SERVICES

Date Received

10/16/20

Initials

CRComment: Refer to providerR. Shively, RN

RN/LPN/Health Care Provider Signature

10/16/2020

Date

"Return the "Request for Health Services" with the disposition of the inmate's request in the comment section to the inmate after scanning into the inmate's EHR.

NOTE: All "Keep on Person" (KOP's) medication refill requests must be submitted to the facility's health services unit or to the medical host facility, using the "Medication Refill Slip" (DOC 140130M). "Medication Refill Slips" must be submitted within ten days of the date the medication expires or runs out. "Medication Refill Slips" are readily available and accessible at designated locations within the facility.

Exhibit 113DOC 140117A
(R 5/17)

RECEIVED

OCT 21 2020

2020-
4999-1

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

TO: MR. MARTINEZ, JIM FACILITY/UNIT: DCF DATE: 10-20-20
(NAME AND TITLE OF STAFF MEMBER)

I have have not ☒ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: N/A facility: N/A grievance #: N/A
I affirm that I do do not ☒ have a grievance pending on this issue.
I affirm that I do do not have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: CN-16-463(WADG); CR-17-293-EDCK
This request does ☒ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

I ARRIVED HERE ON OCT. 2, 2020, I SENT RTS TO PROPERTY ON OCT. 3, 2020 CONCERNING MY LEGAL PROPERTY THAT WAS LEFT AT OSP. I HAVE PENDING CASES AND LEGAL DEADLINES AND I NEED MY LEGAL PROPERTY THAT IS IN EXCESS OF ONE CUBIC FEET. I MENTIONED (OVER)
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISPOSITION. I HAVE MENTIONED THIS TO YOU AND MR KING. I WOULD LIKE FOR YOU TO CONTACT OSP WARDEN AND PROPERTY TO SEE WHY MY PROPERTY HAS NOT BEEN SENT TO THIS FACILITY. THANK YOU.

NAME: EZEKIEL DAVIS DOC NUMBER: 186754 UNIT & CELL NUMBER: EB-213
(PRINT)

SIGNATURE: Ezekiel Davis WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE

OCT 27 2020

DISPOSITION:

Sgt. Morrison spoke with the OSP property department and was advised that property from OSP would be sent via the next bus from OSP to DCF.

STAFF MEMBER

DATE

Date response sent to inmate/offender: 10/28/2020

OCT 29 2020

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

{ Exhibit 12 }
1 of 2

Spoke with you on Oct. 3, 2020 and Oct. 19, 2020 while in the
law library cage, and to Mr. King.
I have legal deadlines and need my legal property.

Exhibit 12
2 of 2

RECEIVED

OCT 16 2020

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

BY: _____

TO: PROPERTY SUPERVISOR FACILITY/UNIT: ACF DATE: 10-14-20
(NAME AND TITLE OF STAFF MEMBER)

I have ☒ have not _____ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: 10-5-20 facility: ACF grievance #: UNKNOWN
I affirm that I do _____ do not ☒ have a grievance pending on this issue.
I affirm that I do ☒ do not _____ have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: CAL-16-962(WACK) CAL-17-293(ENCK)
This request _____ does ☒ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

I ARRIVED HERE 10-2-20 AND SUBMITTED A RTS ON 10-5-20 CONCERN
LEGAL PROPERTY THAT WAS LEFT AT OSP, THE PROPERTY OFFICER SAID THAT HE WOULD
SEND MY PROPERTY. CAN YOU CHECK AND SEE IF MY PROPERTY HAS BEEN
SENT FROM OSP.

(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISPOSITION. CAN YOU CALL OSP PROPERTY SUPERVISOR AND FIND OUT
WHETHER MY PROPERTY WAS SENT, I NEED MY LEGAL DOCUMENTS FOR MY
PENDING CASES ABOVE.

NAME: EFFIE DAVIS DOC NUMBER: 186754 UNIT & CELL NUMBER: 213
(PRINT)

SIGNATURE: E. Davis (CORNUDE) WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE

OCT 20 2020

DISPOSITION:

Nothing has arrived at this time. DSP stated it will
pick up tomorrow to be brought here

STAFF MEMBER

DATE

Date response sent to inmate/offender: OCT 28 2020

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

Exhibit 13

RECEIVED

OCT 06 2020

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

BY: _____

TO: Property Supervisor FACILITY/UNIT: DCF/PORTAL DATE: 10-5-20
(NAME AND TITLE OF STAFF MEMBER)

I have ____ have not ☒ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: N/A facility: N/A grievance #: N/A
I affirm that I do ____ do not ☒ have a grievance pending on this issue.
I affirm that I do ☒ do not ____ have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: CIV-16-462 (W.D. OK); CIV-17-373 (W.D. OK)
This request ____ does ☒ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

I ARRIVED HERE ON 10-2-20, AND I STILL HAVE LEGAL PROPERTY AT THE
OKLAHOMA STATE PENITENTIARY (OSP). I WOULD LIKE FOR THE PROPERTY SUPERVISOR
TO CONTACT OSP PROPERTY SUPERVISOR AND ASK THEM TO SEND ME MY LEGAL
PROPERTY.

(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISPOSITION. I WOULD LIKE THE REST OF MY LEGAL PROPERTY FROM
OSP. THANK YOU.

NAME: Ezekiel Davis DOC NUMBER: 186734 UNIT & CELL NUMBER: EB-215
(PRINT)

SIGNATURE: Ezekiel Davis WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE

OCT 08 2020

DISPOSITION:

Refer to RTS 2020-4874

Sgt Harrison

10-23-2020

STAFF MEMBER

DATE

Date response sent to inmate/offender: _____

OCT 28 2020

1. Original to file
2. Copy to inmate/offender

RECEIVED OCT 09 2020 000000124D (R 4/19)
R. M. {Exhibit 14}

COPY

RECEIVED

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

OCT 19 2020

TO: DA. E. SANDERS FACILITY/UNIT: N/A DATE: 10-15-20
(NAME AND TITLE OF STAFF MEMBER)

I have have not ✓ already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: N/A facility: N/A grievance #: N/A
I affirm that I do do not ✓ have a grievance pending on this issue.
I affirm that I do ✓ do not have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: CIV-16-462(W.D.OK); CIV-17-293(E.D.OK)
This request does ✓ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

ON 10-15-20, I SUBMITTED A SCR CONCERNING MY SPINAL CONDITION THAT YOU ARE AWARE OF, WHICH DIRECTLY AFFECTS MY QUALITY OF LIFE DUE TO THE PAIN THAT I'M IN, BECAUSE MY FEET ARE UNBALANCED DUE TO HIGH ARCHES, I HAVE A BUNION AND PHOSPHORUS WART ON MY RIGHT FOOT (OVER)
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISPOSITION. I WOULD LIKE BETTER ARCH SUPPORT (ATHLETIC SHOES) AND/OR TO BE SEEN BY A PODIATRIST. I AM INDIGENT AND THE ONLY WAY I CAN AFFORD TO PURCHASE SHOES IS WITH MY GANG PAY. PLEASE PROVIDE COPY OF RPS.

NAME: REEKIE DAVIS DOC NUMBER: 186754 UNIT & CELL NUMBER: EB-213
(PRINT)

SIGNATURE: Reekie Davis WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE

OCT 21 2020

DISPOSITION: You will need to contact the
Warden.

Ray Paim R 10-26-2020
STAFF MEMBER DATE

Date response sent to inmate/offender: OCT 28 2020

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

Exhibit 15
1 of 2

I would like to be APPROVED to PURCHASE Athletic shoe by using my
gang pay - I'm indigent.

I would also like for you to EXAMINE my feet and document your diagnosis
OR SEND ME to a podiatrist.

{Exhibit 15}
2 of 2

RECEIVED

OCT 19 2020

Must Be Submitted Through the Law Library or Designee
Inmate/Offender Grievance Process
REQUEST TO STAFF

TO: Dr. F. Sanders FACILITY/UNIT: MF DATE: 10-15-20
(NAME AND TITLE OF STAFF MEMBER)

I have have not already submitted a "Request to Staff" or grievance on this same issue.
If yes, what date: N/A facility: N/A grievance #: N/A
I affirm that I do do not have a grievance pending on this issue.
I affirm that I do do not have a lawsuit of any type pending that relates in any way to this issue.
If a lawsuit is pending, indicate case number and court: CIV-16-462 (W.D. OK); CIV-17-223 (E.D. OK)
This request does does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

ON 10-15-20, I SUBMITTED A SCR CONCERNING MY SPINAL CONDITION THAT YOU ARE AWARE OF, WHICH DIRECTLY AFFECTS MY QUALITY OF LIFE DUE TO THE PAIN THAT I'M IN, BECAUSE MY FEET ARE UNBALANCED DUE TO HIGH ARCHES, I HAVE A BUNION AND PHOSPHORUS WART ON MY RIGHT FOOT (OVER)
(USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISPOSITION. I WOULD LIKE BETTER ARCH SUPPORT (ATHLETIC SHOES) AND/OR TO BE SEEN BY A PODIATRIST. I AM INDIGENT AND THE ONLY WAY I CAN AFFORD TO PURCHASE SHOES IS WITH MY GANG PAY. PLEASE PROVIDE COPY OF RIS.

NAME: LEEKIE/DAVIS DOC NUMBER: 186734 UNIT & CELL NUMBER: AB-213
(PRINT)

SIGNATURE: Ezekiel Davis WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE

OCT 21 2020

DISPOSITION:

STAFF MEMBER

DATE

Date response sent to Inmate/offender: _____

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

Exhibit 16
1 of 2

I would like to be APPROVED to PURCHASE ATHLETIC SHOE by using my
gang pay - I'm indigent.

I would also like for you to EXAMINE my feet and document your diagnosis
OR SEND ME to a podiatrist.

{Exhibit 16}
2 of 2 }

RECEIVED

Must Be Submitted Through the Law Library or Designee OCT 26 2020
 Inmate/Offender Grievance Process
 REQUEST TO STAFF BY: _____

TO: SR. Bailey, Trust Fund FACILITY/UNIT: ACF DATE: 10-22-20
 (NAME AND TITLE OF STAFF MEMBER)

I have _____ have not ☒ already submitted a "Request to Staff" or grievance on this same issue.
 If yes, what date: N/A facility: N/A grievance #: N/A
 I affirm that I do _____ do not ☒ have a grievance pending on this issue.
 I affirm that I do ☒ do not _____ have a lawsuit of any type pending that relates in any way to this issue.
 If a lawsuit is pending, indicate case number and court: CN-16-462(WDOK); CN-17-293(OK)
 This request _____ does ☒ does not relate to a pending misconduct report. If it does, this request may only be answered by the disciplinary coordinator assigned to the misconduct.

SUBJECT: State completely, but briefly, the problem on which you desire assistance. This statement must be specific as to the complaint, dates, places, personnel involved, and how you were affected. One issue or incident per "Request to Staff." Your failure to specifically state your problem may result in this being returned unanswered.

IN ACCORDANCE LAW I CAN COMMUNICATE WITH ANY ATTORNEY I CHOOSE TO FOR LEGAL REPRESENTATION OR ADVICE. THESE ATTORNEYS ARE REPRESENTING (THOMAS G. FERGUSON & AUSTIN J. YOUNG) PRISON OFFICIALS IN CN-16-462-PRW-(WDOK). PLEASE STATE THE POLICY THAT IS PLACING A RESTRICTION ON WHICH ATTORNEYS (OVER)
 (USE OTHER SIDE IF MORE SPACE IS NEEDED. DO NOT ATTACH ADDITIONAL PAGES.)

ACTION REQUESTED: State exactly how you believe your request may be handled; that is, what exactly should be done and how.

PLEASE GIVE DISPOSITION. OP-030115 (IV) (E) (1), IS A ILLEGAL POLICY, I AM HEREBY PLACING YOU ON NOTICE THAT YOU ARE FOLLOWING A POLICY THAT IS ILLEGAL AND IN ACCORDANCE WITH OP110215 (II) (A) (1) (a) - NOTICE "COMPLYING WITH LAWS IS FIRST, IF I HAVE TO PURSUE, THIS I WILL SUE - SOMEBODY."

NAME: Ezekiel Davis (PRINT) DOC NUMBER: 186754 UNIT & CELL NUMBER: EB-913

SIGNATURE: Ezekiel Davis (COPY MADE) WORK ASSIGNMENT: N/A

DO NOT WRITE BELOW THIS LINE OCT 29 2020

DISPOSITION:

OP-030115 you are only denied from attorney shopping, not from communicating with your attorney of record,

STAFF MEMBER [Signature]DATE 11/4/20RECEIVED
NOV 03 2020Date response sent to inmate/offender: NOV 06 2020BY: SPB

1. Original to file
2. Copy to inmate/offender

DOC 090124D (R 4/19)

Exhibit 16
 1 of 2

I choice to communicate with so I can challenge this unlawful policy.
Frank Thomas has NOT represented me in (30) years.

Exhibit 16
2 of 2

REC'D 10-30-20

This is not your atty
of record. You can
either use your indigent
Postage to mail or you can
mail when you have the
funds.

SE Bailey
Trust fund

Mr. Davis.

Frank Thomas is
Your Attorney of Record.
This is the only Attorney
you can send Correspondence
with by disbursement.
The others you must provide
your own stamp or use your
indigent stamp for. SE Bailey

Exhibit 17